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CONNECTED 26-Nov-87 08146 24

SPILLSEPA WSH.  
ATTENTION THOMAS MASSEY / TIM FIELDS

POLREP #1  
AMERICAN ST. TANNERY  
PHILADELPHIA, PENNSYLVANIA

I. SITUATION AS OF 8:15 AM ON FRIDAY JULY 31, 1987

A. OSC NOTIFIED OF THIS SITE BY OSC BOB CARON AT 9:00 AM ON MONDAY JULY 27, 1987. ON SATURDAY JULY 25, 1987 OSC'S CARON AND CLARK RESPONDED TO THE SITE AFTER INFORMATION WAS GIVEN TO THEM THAT DATE BY EVAN SCHOFIELD OF THE PHILA INDUSTRIAL WASTE UNIT. THE FOLLOWING WAS NOTED DURING THE ASSESSMENT:

- 10 VATS OF UNKNOWN MATERIALS
- 100 DRUMS SULFURIC ACID (INSIDE)
- 50 DRUMS SODIUM SULFIDE (INSIDE)
- 50-100 DRUMS OF A LEATHER FINISHING COMPOUND
- STORAGE TANK INSIDE (EST. 5000) GALLONS
- 30-50 DRUMS SULFURIC ACID (OUTSIDE)
- LARGE TANK ON TOP OF BUILDING

B. BUILDING WAS USED AS A TANNERY, IS FOUR STORIES, AND IS SITUATED IN A RESIDENTIAL NEIGHBORHOOD.

C. BUILDING IS UNSECURED EXCEPT FOR BANNERGUARD PLACED BY OSC CARON AND CLARK AND THE BUILDING HAS BEEN VANDALIZED.

D. ALL INFORMATION ABOVE IS PRELIMINARY.

II. ACTIONS TAKEN

A. SITE WAS OFFICIALLY CALLED IN TO EPA AT 9:35 AM ON 7/27/87 BY ED BAXTER OF THE PHILA FIRE MARSHALLS OFFICE.

B. OSC SPOKE WITH JOHN HADALSKI OF PHILA EMA AT 1:30 PM ON 7/27/87. THE OSC WAS INFORMED OF MEETING WITH THE CITY FIRE MARSHALLS OFFICE, SOLICITOR'S OFFICE, PHILA L AND I, AND THE OWNER OF THE PROPERTY TO BE HELD AT 10:00 AM THIS DATE.

C. OSC COORDINATED SITE CONCERNS WITH ROBERT ZANG OF PADER AT 3:30 PM ON 7/27/87. ZANG WILL ATTEND TODAY'S MEETING.

D. OSC ADVISED MARY LETZKUS (ENFORCEMENT) OF THE SITUATION AT 11:35 AM ON 7/27/87.

III. FUTURE PLANS

A. OSC, ENFORCEMENT AND TAT TO PERFORM SITE ASSESSMENT AND ATTEND MEETING WITH PRP THIS DATE.

DAVID WRIGHT  
ON-SCENE COORDINATOR

AR100002

To: ERD/OERR (EPASS11)  
To: T. MASSEY (EPF9374)  
From: T. MASSEY (EPH9374) Delivered: Fri 31-July-87 17:32 EDT Sys 163  
Subject: AMERICAN STREET TANNERY SITE  
Mail Id: IPM-163-870731-157920793

AMERICAN STREET TANNERY SITE  
PHILA., PHILA. COUNTY, PA  
POLREP #2

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1705 HRS JULY 31, 1987)

- A. OSC, TAT, AND REPRESENTATIVES FROM THE CITY OF PHILA. AND THE STATE OF PA MET AT 1015 BODINE STREET, THE SITE OF A DEFUNCT TANNERY OPERATION, TO ASSESS THE POTENTIAL THREAT WITH A REPRESENTATIVE FROM CUSTOM LEATHER FINISHERS.
- B. PERSONNEL ON SCENE:
  - EPA-3
  - TAT-3
  - STATE-1
  - CITY-4
  - PRP-1
- C. WEATHER: CLEAR, HOT, HIGHS IN THE 80'S

II. ACTIONS TAKEN

- A. OSC WRIGHT AND JR OSC CLARK MET 1000 HRS 7/31/87 WITH THE FOLLOWING INDIVIDUALS/ORGANIZATIONS:
  - BILL STEUTEVILLE/EPA-ENFORCEMENT
  - JEFF LIEBERMAN/TAT
  - SAM KENNEDY/TAT
  - SHEKAR SUBRAMANIAM/TAT
  - ROBERT ZANG/PADER
  - RICHARD ZIPIN/DEPT OF HEALTH
  - ED BAXTER/FIRE MARSHALL
  - TOM PATTERSON/LICENSES AND INSPECTIONS
  - CURELEY COLE/LAW DEPT
  - CHARLES EISENFELDER/CUSTOM LEATHER FINISHERS
- B. FROM 1015 HRS TO 1130 HRS, THE OSC ALONG WITH THE ABOVE PERSONNEL PERFORMED AN ASSESSMENT OF THE SITE TO DETERMINE THE POTENTIAL THREAT.
- C. AT 1130 HRS, THE OSC DISCUSSED THE ASSESSMENT WITH THE ABOVE PERSONNEL. THE FOLLOWING WAS NOTED:
  - PHILA FIRE MARSHALL BAXTER AND L&I PATTERSON ADVISED THE OSC THAT THE BUILDING POSED A SERIOUS THREAT WITH THE POTENTIAL FOR FIRE AND EXPLOSION COMPOUNDED BY THE PRESENCE OF CORROSIVE, FLAMMABLE, COMBUSTIBLE, TOXIC, AND CARCINOGENIC MATERIALS STORED BOTH INSIDE AND OUTSIDE THE BUILDING.
  - BOTH PADER AND TAT CONCURRED WITH THIS ASSESSMENT.

AR100003

**D. DURING THE ASSESSMENT EVIDENCE WAS FOUND INDICATING THE PRESENCE OF THE FOLLOWING MATERIALS:**

HYDRAULIC OIL	SODIUM HYPOCHLORIDE
ATLASENE	CAUSTIC SODA
AMMONIUM HYDROXIDE	KATHON-LP
SULPHURIC ACID	TRITON
SODIUM SULFIDE	SUPERBETONE
AQUATONE	LEAD CHROMATE
LEATHER FINISHING COMPOUNDS	HYDROGEN SELENIDE
TOLUENE	UNACRYL RESIN
LACQUERS	POLYALKYLENE GLYCOL
HYDROCHLORIC ACID	AMYL ACETATE
CHLOROFORM	ANILINE RESIN
POTASSIUM FERROCYANIDE	

**E. OTHER OBSERVATIONS WERE NOTED AS FOLLOWS:**

- BUILDING INTEGRITY WAS POOR, 1# HOLES IN FLOOR, GENERAL DISREPAIR
- OPEN DRUMS WERE NOTED REGISTERING ORGANIC VAPORS 15 PPM ABOVE BACKGROUND (UTILIZED HNU PHOTOIONIZER UNIT)
- INCOMPATIBLE CHEMICALS WERE STORED TOGETHER, 1# SULFURIC ACID AND SODIUM HYDROSULFIDE (COULD FORM HYDROGEN SULFIDE GAS)

**F. BASED ON THE ABOVE INFORMATION THE OSC HAS DETERMINED THAT THE SITE POSES A THREAT DUE TO THE POTENTIAL FOR FIRE/EXPLOSION, DIRECT CONTACT AND INHALATION WITH MATERIALS STORED IN AND AROUND THE BUILDING.**

**G. AT 1230 HRS THIS DATE, THE OSC IN THE PRESENCE OF TAT, CITY REPRESENTATIVES AND PADER ISSUED VERBAL NOTICE TO THE ONLY IDENTIFIED POTENTIALLY RESPONSIBLE PARTY (CHARLES EISENFELDER REPRESENTING CUSTOM LEATHER FINISHERS) AND ADVISED HIM OF THE THREAT DETERMINATION. THE OSC THEN REQUESTED HIM TO DO THE FOLLOWING:**

1. SECURE ACCESS TO THE BUILDING THIS DATE. THIS MAINLY INCLUDES RESTRICTING ACCESS THROUGH THE DOORS AND WINDOWS.
2. BEGINNING 0700 HRS 8/4/87, PERFORM A COMPLETE AND DETAILED INVENTORY OF ALL HAZARDOUS MATERIALS STORED AT THE SITE. THIS SHALL INCLUDE BUT NOT BE LIMITED TO VATS, DRUMS, TANKS, JARS, CYLINDERS, BAGS, AND BOXES.
3. SUPPLY A CLEANUP WORK PLAN TO THE OSC BY COB 8/7/87.

**H. PRP REPRESENTATIVE INDICATED A WILLINGNESS TO PERFORM THE ABOVE MENTIONED WORK AND HAS THUS RESPONDED TO THE VERBAL NOTICE GIVEN TO HIM.**

AR100004

I. IF THE ABOVE ITEMS ARE NOT SATISFACTORILY PERFORMED BY COS 8/7/87, THE OSC WILL USE HIS DELEGATION OF AUTHORITY UNDER BAMA TO PERFORM A REMOVAL ACTION. FURTHERMORE EPA/ENFORCEMENT STEUTEVILLE EXPECTS TO HAVE A CERCLA ORDER PREPARED BY THIS DATE. THE OSC'S ACTIONS ARE IN NO WAY DEPENDENT ON THE STATUS OF THIS ORDER.

J. THE OSC HAS TASKED THE TAT WITH THE FOLLOWING:  
-DRAFT PRELIMINARY WORK PLAN  
-DRAFT ACTION MEMO  
-MONITOR PRP ACTIVITIES  
-DETERMINE HAZARDS AND COMPATIBILITIES OF CHEMICALS  
ON SITE

K. OSC HAS REQUESTED FROM THE CITY OF PHILADELPHIA THROUGH THE FIRE MARSHALL'S OFFICE AND THE LAW DEPT TO STEP UP POLICE PATROLS THROUGH THE AREA.

III. FUTURE PLANS

- A. OSC TO MEET WITH THE PRP 0700 HRS ON 8/4/87 TO BEGIN THE INVENTORY.
- B. TAT TO VISIT THE SITE ON 8/1, 8/2, 8/3/87 TO INSURE THAT SITE SECURITY IS STILL IN EFFECT.
- C. THE CITY OF PHILADELPHIA WILL DETERMINE THE OPERATIONAL STATUS OF THE SPRINKLER SYSTEM.
- D. THE CITY OF PHILADELPHIA TO CONDUCT A HEARING CONCERNING TITLE 5 VIOLATIONS AT 0945 HRS ON 8/5/87, COURTROOM 475.
- E. EPA/ENFORCEMENT STEUTEVILLE TO BE LEAD FOR THE INVESTIGATION OF OTHER PRP'S.

DAVID WRIGHT, OSC  
EMERGENCY RESPONSE TEAM  
EPA III PHILA., PA

AR100005

TLX II 7108229249  
CONNECTED 087-11407 49

SPIILLSEPA WSM  
ATTN TOM MASSEY / TIM FIELDS

POLREP #3  
AMERICAN STREET TANNERY SITE  
PHILADELPHIA, PENNSYLVANIA

I. SITUATION 10:30 AM ON TUESDAY AUGUST 4, 1987

A. BUILDING REMAINS SECURE AS COMPLETED BY PRP CHARLES EISENFELDER (CUSTOM LEATHER SERVICES, INC.) ON FRIDAY JULY 31, 1987.

II. ACTIONS TAKEN

A. PHILA CITY COUNCIL REP. DIAZ CONTACTED THE OSC AT 3:35 PM ON MONDAY AUGUST 3 CONCERNING THE STATUS OF THE SITE.

B. OSC WAS ADVISED BY MARY LETZKUS OF CERCLA ENFORCEMENT AT 4:15 ON MONDAY AUGUST 3 THAT SHE HAD BEEN CONTACTED BY PRP EISENFELDER AND THAT HE WOULD NOT BE ON SITE 8/4 AT 7:00 AM TO BEGIN THE INVENTORY AND ASSESSMENT AND HAD INDICATED THAT HE DID NOT REALIZE WHAT HE WAS GETTING INTO WHEN HE RESPONDED POSITIVE TO THE ORAL NOTICE GIVEN HIM AT 12:30 PM ON FRIDAY JULY 31, 1987. (REFERENCE POLREP #2)

C. TAT STOPPED BY THE SITE AT THE OSC'S DIRECTION ON SATURDAY, SUNDAY, AND MONDAY (AUGUST 1 THROUGH 3). TAT OBSERVATION WAS THAT THE SITE WAS SECURED.

D. AT 9:00 AM THIS DATE THE OSC AND ENFORCEMENT STEUTEVILLE HELD CONFERENCE CALL WITH PRP EISENFELDER. PRP INDICATED THAT HE WOULD NOT BE ABLE TO BEGIN THE ASSESSMENT. FURTHER HE INDICATED THAT HE NEEDED TO CONSULT WITH COUNSEL AND WAS STILL WILLING TO PERFORM THE WORK. THE OSC HAS DETERMINED THAT EPA AND TAT WILL PERFORM THE PRELIMINARY ASSESSMENT/INVENTORY PURSUANT TO SECTION 300.64 OF THE NATIONAL CONTINGENCY PLAN. THIS ASSESSMENT WILL BE PERFORMED IN THE ABSENCE OF THE PRP PERFORMING THIS WORK. THE ASSESSMENT WILL BEGIN AT 2:00 PM THIS DATE AND THE OSC HAS ADVISED THE PRP OF THIS.

E. AT 10:00 AM THIS DATE THE OSC ADVISED JOHN HIDALSKI OF PHILA EPA OF THE PLANS. OSC REQUESTED THAT HIDALSKI CONTACT THE FIRE MARSHALLS OFFICE, L AND I, AND THE PHILA LAW DEPT TO ADVISE THEM OF THE SITUATION.

F. AT 10:10 AM THIS DATE THE OSC BRIEFED OPA ANN CARDINAL OF THE SITE STATUS AND PLANS.

G. AT 10:15 AM THE OSC ATTEMPTED TO CONTACT PADER ROBERT ZANG OF THE STATUS BUT HE WAS NOT AVAILABLE.

H. OSC SENT NOTICE LETTER TO PRP EISENFELDER THIS DATE BY WAY OF CERTIFIED MAIL. THIS LETTER WAS REVIEWED BY OSC RADER.

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## II. FUTURE PLANS

- A. ASSESSMENT TO BEGIN AT 2:00 PM THIS DATE BY THE OSC/TAT.
- B. OSC AWAITS PRP RESPONSE TO THE BALANCE OF THE NOTICE GIVEN HIM. THE PRP IS TO SUBMIT WORK PLAN BY COB FRIDAY AUGUST 7, 1987.
- C. ENFORCEMENT REMAINS LEAD IN IDENTIFICATION OF OTHER PRP'S AND ORDER ISSUES.
- D. OSC ANTICIPATES THE ASSESSMENT TO BE COMPLETE BY COB FRIDAY BUT THIS MAY DEPEND ON WORK PROGRESS IN THE HEAT.

DAVID WRIGHT  
IN SCENE COORDINATOR  
EMERGENCY RESPONSE TEAM ....  
PA III, PHILA, PA

AR100007

POLREP #4  
AMERICAN STREET TANNERY SITE  
PHILADELPHIA, PHILADELPHIA CO. PA

I. SITUATION (2000 HRS TUESDAY AUGUST 4, 1987)

A. OSC DECIDES TO GO AHEAD WITH PRELIMINARY SITE  
ASSESSMENT/CHEMICAL INVENTORY. (REFERENCE POLREP #3)

II. ACTIONS TAKEN

A. 1400 - 1900 HRS DESPITE EXTREME WEATHER CONDITIONS  
(TEMPERATURES IN THE UPPER 90'S) OSC AND TAT PERFORMED  
50 % OF THE CHEMICAL INVENTORY

III. FUTURE PLANS

A. OSC AND TAT TO MEET ONSITE AT 0800 HRS WEDNESDAY AUGUST  
5, 1987 TO CONTINUE CHEMICAL INVENTORY

DAVID P. WRIGHT, OSC  
EMERGENCY RESPONSE TEAM  
EPA III PHILA., PA

AR100008

POLREP #5  
AMERICAN STREET TANNERY  
PHILADELPHIA, PA

I. SITUATION (1800 HRS WEDNESDAY AUGUST 5, 1987)

A. WEATHER -- TEMPS MID 90's RAIN BEGINNING AT 1530 HRS

B. OSC AND TATM's (6) CONTINUE CHEMICAL INVENTORY AND ASSESSMENT

C. CITY OF PHILADELPHIA DEPUTY SHERIFF ON SITE 1330 HRS THIS DATE TO ISSUE ARREST WARRANT TO PRP REPRESENTATIVE C. EISENFELDER FOR NOT APPEARING IN COURT AT 0945 HRS THIS DATE.

D. EPA/ENFORCEMENT W. STEUTEVILLE AND OSC ARAI ON SITE FOR BRIEFING AND WALK THROUGH OF FIRST FLOOR.

II ACTIONS TAKEN

A. WHILE PERFORMING INVENTORY A WHITE MIST WAS DISCOVERED, LEVEL B INVESTIGATION BY TAT REVEALED OPEN SULFURIC ACID DRUMS WHICH IN THE HIGH HUMIDITY PRESENT BEFORE THE RAINS WOULD PRODUCE A WHITE MIST.

B. DURING INVENTORY OSC FOUND CONTAINER OF ETHYL ETHER, A HIGHLY EXPLOSIVE, HIGHLY FLAMMABLE, SHOCK SENSITIVE MATERIAL.

III FUTURE PLANS

A. OSC AND TAT TO CONTINUE INVENTORY AND ASSESSMENT OF SITE

B. OSC TO CONTACT EPA ENFORCEMENT W. STEUTEVILLE TO DETERMINE PRP's RESPONSIVENESS. IF PRP REPRESENTATIVE IS UNRESPONSIVE OSC PLANS TO ACTIVATE SUPERFUND TO INITIATE CLEANUP OF SITE.

DAVID P. WRIGHT, OSC  
EMERGENCY RESPONSE TEAM  
EPA REG. III PHILA. PA

AR100009



POLREI' #6  
AMERICAN STREET TANNERY SITE  
PHILADELPHIA, PA  
ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION ( 9:00 PM AUGUST 6, 1987)

- A. CHEMICAL INVENTORY ACTIVITIES CONTINUE THIS DATE
- B. DUE TO UNRESPONSIVENESS OF RP, OSC ELECTS TO USE HIS DELEGATION OF AUTHORITY TO ACTIVATE SUPERFUND

II. ACTIONS TAKEN

- A. TAT COMPLETED CHEMICAL INVENTORY FOR THE UPPER FLOORS THIS DATE. ONLY A PORTION OF THE FIRST FLOOR REMAINS
- B. AT 9:00 AM THIS DATE, THE OSC CONTACTED PRP EISENFELDER TO INQUIRE AS TO HIS CURRENT POSITION ON PERFORMING THE CLEANUP. EISENFELDER WAS TO CALL EPA THE AFTERNOON OF 8/5/87 AND DID NOT. PRP INDICATED THAT HE WAS NOT ABLE TO CALL AS HE WAS IN COURT IN PHILA, PA. NOTE: THE PHILA SHERIFF'S DEPT WAS ONSITE 8/5/87 WITH A WARRANT FOR MR EISENFELDER WHOM IN FACT DID NOT APPEAR IN COURT. THE OSC ADVISED HIM THAT THE FUND WOULD BE ACTIVATED THIS DATE, MAKING IT A FEDERAL REMOVAL PROJECT. THE OSC MADE THIS DETERMINATION AS THE PRP WAS NOT BEING RESPONSIVE TO THE THREAT TO PUBLIC HEALTH AND THE ENVIRONMENT. THE OSC ADVISED EPA/ENFORCEMENT STEUTEVILLE OF THE ACTION AT 9:15 AM THIS DATE.
- C. THE OSC BRIEFED EPA/PUBLIC AFFAIRS GERMANN THIS DATE AT 9:15 AM
- D. THE OSC CONTACTED PHILA EMA AT 9:30 AM THIS DATE AS TO SITE STATUS
- E. PHILA L & I PATTERSON ONSITE THIS DATE AT 11:30 AM TO OFFER ASSISTANCE AS NECESSARY
- F. OSC INITIATES 40K DELIVERY ORDER TO OHM COPUS AT 12:00 NOON THIS DATE. RESPONSE MANAGER TO BE ON SCENE THIS DATE BY 2:30 PM.
- G. OSC AND TAT MET WITH CAPT BAKER OF THE 26TH DISTRICT OF THE PHILA POLICE AT 1:45 PM THIS DATE WITH RESPECT TO CORDONING OFF BODINE STREET FOR THE REMOVAL ACTION
- H. ERCS REP DAVE LEDENHAM ON SCENE AT 2:30 PM THIS DATE. ERCS AND OSC/TAT PERFORMED WALK THROUGH
- I. SGT LYNCH OF THE PHILA POLICE ON SCENE AT 2:35 TO INQUIRE AS TO THE NEED TO BLOCK OFF BODINE STREET. HE CONCURRED WITH THE OSC'S POSITION AND WILL HAVE POLICE BARRICADES AT THE SITE THE AM OF 8/7/87

III. FUTURE PLANS

- A. TAT ASSESSMENT TO CONTINUE 8/7/87
- B. ERCS TO MOBILIZE 1 RM, 1 PCT, 2 CHEMISTS, AND 4 RT. IN ADDITION, A COMMAND POST AND SPILL TRUCK WILL BE ON SCENE. ERCS TO BEGIN TO CHARACTERIZE, STORE, SECURE, AND SEGREGATE MATERIALS ON SITE
- C. STREET TO BE OFFICIALLY BLOCKED OFF ON 8/7/87
- D. ADDITIONAL FUNDING REQUEST TO BE SUBMITTED NO LATER THAN COB 8/11/87

DAVE WRIGHT  
ON SCENE COORDINATOR  
EPA III PHILA, PA

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